

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

UNITED STATES OF AMERICA

VS.

CRIMINAL NO.: 3:19-CR-164-CWR

HUMBERTO SALVADOR-LOPEZ

DEFENDANT

MOTION TO CONTINUE

COMES NOW the Defendant, by and through counsel, and files this Motion to Continue and would state unto the Honorable Court the following, to wit:

1. That a trial in this matter is set for November 4, 2019.
2. That the attorney for the Defendant, was appointed to represent the Defendant in this matter on August 26, 2019.
3. That the Defendant in this matter does not speak english and has been housed in a detention facility more than three (3) hours away from his attorney's office. Furthermore, that it has been extremely difficult, logistically speaking, to meet with the Defendant, communicate with the Defendant, and properly prepare for a trial in this matter under the current pre-trial and trial deadlines. Therefore, the Defendant's appointed counsel request a continuance.
4. That counsel for the Defendant request that trial in this matter be reset for the December, 2019 or the January 2020 term of Court. Furthermore, the Defendant request that a pretrial conference be held on November 4, 2019.
5. That counsel for the Defendant request that all pre-trial motion deadlines also be reset and extended for the same reasons as set out above.
6. That the Defendant also request that this Court grant an extension of time to file all dispositive, non-dispositive motions, and also to continue the trial of this case on grounds that the failure to grant such a continuance would deny counsel for the Defendant the reasonable time necessary for effective

preparation, taking into account the exercise of due diligence. 18 U.S.C. §3161(h)(7)(B)(iv).

7. That Counsel for Defendant has contacted the attorney representing the United States in this matter, and Counsel has made no objection to a continuance.
8. That the Defendant has previously signed a waiver of his speedy trial rights in regards to anytime related to the granting of a prior continuance, and now waives those rights again through his attorney in requesting this continuance.
9. That the ends of justice will be served by granting the continuance requested.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the Court will grant the continuance as requested herein.

RESPECTFULLY SUBMITTED, this the 16th day of October, 2019.

DEFENDANT

By: /s/ Brad Mills
M. BRADLEY MILLS, MSB#102070

CERTIFICATE OF SERVICE

I, M. Bradley Mills, attorney for Defendant do hereby certify that I have on this date electronically filed via, the Electronic Case Filing System, a true and correct copy of the foregoing document and provided Notice to all necessary parties.

This the 16th day of October, 2019.

/s/ Brad Mills
M. BRADLEY MILLS

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